

Mrs. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

May 8, 2013

**RE: APPEAL OF MARCH 12, 2013 FUNDING COMMITMENT DECISION LETTER for
FY2012 (Year 15) FRN 2358480, FORM 471 APPLICATION NUMBER 865559**

CC DOCKET NO. 02-6

To Whom It May Concern:

Val Verde Unified School District requests reconsideration of the Funding Commitment Decision for Funding Request Number (FRN) 2358480.

Detailed contact information

Appellant/Organization Name: **Val Verde Unified School District**

Billed Entity Number: **143757**

Contact Person Name: **Matthew Penner**

Contact Mailing Address: **975 W Morgan Street, Perris, CA 92571**

Contact Phone Number: **(951) 940-6100**

E-mail address: **mpenner@valverde.edu**

Val Verde Unified School District (VVUSD or District), Billed Entity Number 143757, is appealing the Funding Commitment Decision Letter (FCDL) for Funding Year 2012 dated March 12, 2013 for Funding Request Number (FRN) 2358480.

Specifically the District is appealing the FCDL decision that "Thirty percent or more of this FRN includes a request for Extron PoleVault Systems PVS 200 IP/associated costs, which is an ineligible product based on Program rules."

Summary of Appeal Request

Val Verde Unified School District is filing this appeal based on the fact that the District applied for funding in good faith using all publicly available information. All indications, including 1) the Eligible Services List (ESL) for Funding Year 2012 as established by the FCC and 2) the Universal Service Administrative Company (USAC) Eligible Products Database, are that the products and services are eligible as requested. To date, nothing publicly available from Universal Service Administrative Company (USAC) contradicts this.

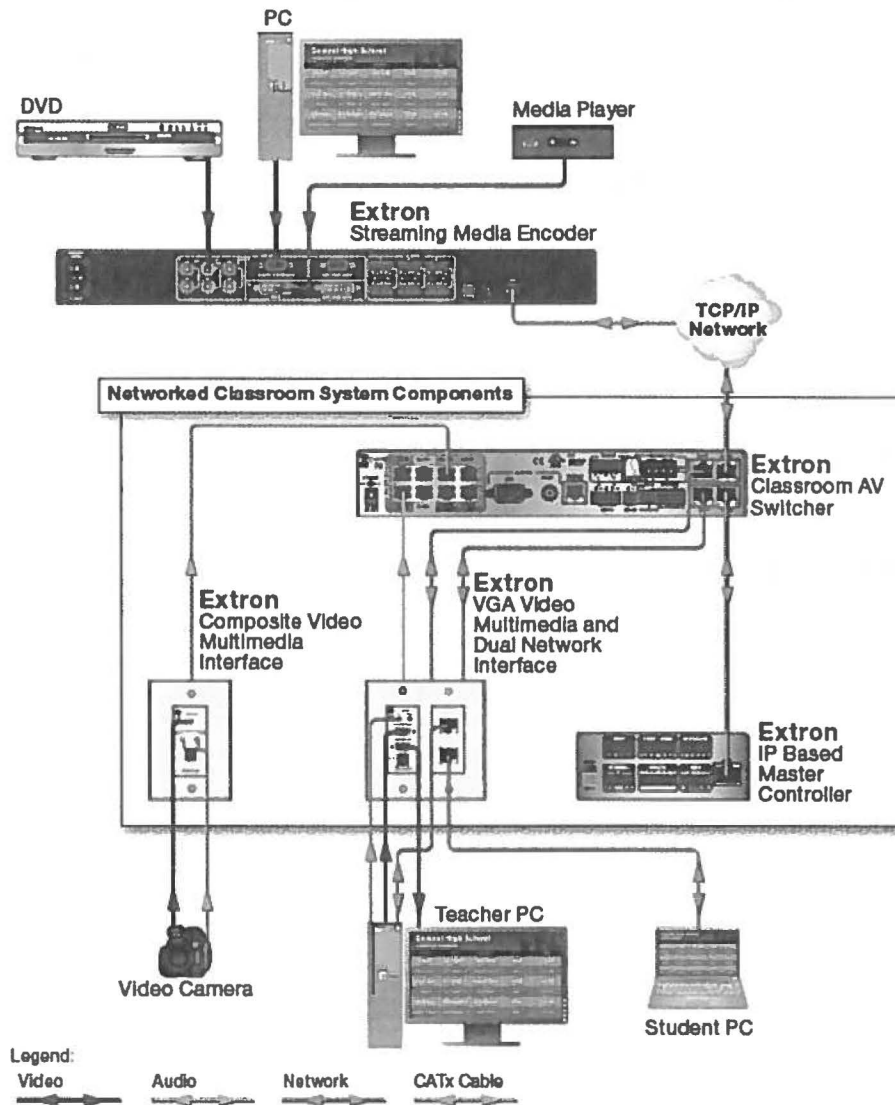
Grounds for Appeal

1. Extron PoleVault systems have been eligible and funded in FY2011 (Year 14) and prior years, as eligible Video Components.
2. The ESL for FY2012 lists specific Video Components as eligible under Internal Connections. The Extron PoleVault systems are primarily comprised of these eligible Video components plus miscellaneous other eligible IC components. *(See Attachment 4)*
3. The USAC Eligible Products Database (EPD) listed PoleVault systems as eligible at the time the FRN was submitted.
4. The EPD currently lists the PoleVault systems as eligible. *(See Attachment 2)*
5. There is no significant change from the FY2011 ESL to the FY2012 ESL which would cause the PoleVault system to change from eligible in FY2011 to FY2012.
6. Ineligible components such as speaker, speaker cable, projector mount and projector cable are already cost allocated out of the funding request in compliance with the cost allocation process indicated under Special Eligibility Conditions section of the ESL FY2012. *(See Attachment 3)*

Additional Information

According to all of the public information posted and provided by the FCC and USAC, the Extron PoleVault Systems are eligible as Video Components under the Internal Connections Category of the Eligible Services List for Funding Year 2012. The Extron PoleVault systems provide the necessary infrastructure to enable students to fully experience audio and video in the individual classrooms and public areas of the libraries for many applications, including distribution of video over IP and video conferencing.

The following diagram demonstrates a typical Extron PoleVault System. The eligible Video Components included in the PoleVault System are shown in the outlined area; the items outside of the outlined area are not included in the PoleVault System.




Appeal Request

Val Verde Unified School District requests reconsideration of Funding Request Number 2358480 to include funding of all eligible products according to Program rules. The District also requests that the FCC make a determination that these products are capable of providing eligible service as defined by the Eligible Services List for Funding Year 2012 under the category of Video Components within the Internal Connections section.

Thank you for your consideration on this matter.

Sincerely,



Matthew Penner
Director of Information and Instructional Technology

CC: CSM
Digital Networks Group
Extron Systems